# UNITED STATES DISTRICT COURT DISTRICT OF OREGON EUGENE DIVISION

SIEMENS MEDICAL SOLUTIONS USA, INC., a Delaware corporation,

Plaintiff,

v.

WS ACQUISITION, LLC dba WESTERN SHELTERS SYSTEMS an Oregon limited liability company,

Defendant.

Case No. 6:23-cv-01882-MC

STIPULATION AND ORDER RE CASE MANAGEMENT SCHEDULE

Pursuant to Federal Rule of Civil Procedure 6(b), counsel for Plaintiff Siemens Medical Solutions USA, INC. ("Plaintiff"), and Defendant WS Acquisition, LLC, d/b/a Western Shelters Systems ("Defendant"), have conferred regarding a proposed schedule for this case. The parties now STIPULATE AND AGREE to request that the Court enter the following case schedule:

## PROPOSED CASE MANAGEMENT SCHEDULE

Event	Proposed Date
Deadline to file Answer or Motion to Dismiss:	March 11, 2024
Deadline for 26(f) Conference:	April 10, 2024
Fact Discovery Deadline:	December 15, 2024

Expert Discovery	January 13, 2025
Expert Disclosures <sup>1</sup> :	February 28, 2025
Rebuttal Expert Disclosures:	March 28, 2025
Expert Discovery Deadline:	
Deadline to File Dispositive Motions:	April 11, 2025
Joint ADR Report:	April 11, 2025
All Other Dates:	All subsequent deadlines to be set following the Joint Status Report

SO STIPULATED: February 22, 2024

#### ANGELI LAW GROUP LLC

# By s/Edward A. Piper

Edward A. Piper, OSB No. 020244 121 SW Morrison St., Suite 400 Portland, OR 97204

Email: ed@angelilaw.com

#### MORGAN, LEWIS & BOCKIUS LLP

#### By s/Damon C. Elder

Damon C. Elder, OSB No. 085313 1301 Second Avenue, Suite 3000

Seattle, WA 98101

Email: damon.elder@morganlewis.com

#### **CROWELL & MORING LLP**

#### By s/Anuj Vohra

Anuj Vohra, (*Pro Hac Vice*) George David Ruttinger, (*Pro Hac Vice*) William Benjamin O'Reilly, (*Pro Hac Vice*) 1001 Pennsylvania Avenue, NW Washington, DC 20004

Email: avohra@crowell.com

gruttinger@crowell.com
woreilly@crowell.com

Attorneys for Plaintiff

#### MORGAN, LEWIS & BOCKIUS LLP

#### By s/Troy S. Brown

Troy S. Brown, (*Pro Hac Vice*) 2222 Market Street Philadelphia, PA 19103

Email: troy.brown@morganlewis.com

#### MULLINS LAW OFFICE, LLC

#### By Scott L. Mullins

Scott L. Mullins, OSB No. 142504 1000 SW Broadway St., Suite 2300

Portland, OR 97205

Email: <a href="mailto:scott@slmullins.com">scott@slmullins.com</a>

Attorneys for Defendant

<sup>&</sup>lt;sup>1</sup> The parties agree that the January 13, 2025 expert disclosure deadline applies to both parties to the extent it is the relevant party's burden of proof on an affirmative claim or defense.

#### **ORDER**

SO ORDERED.

DATED this 23rd day of February, 2024.

s/Michael J. McShane MICHAEL J. McSHANE UNITED STATES DISTRICT COURT

*Presented by*:

### MORGAN, LEWIS & BOCKIUS LLP

By s/Damon C. Elder

Damon C. Elder, OSB No. 085313 1301 Second Avenue, Suite 3000 Seattle, WA 98101

Email: damon.elder@morganlewis.com

# MORGAN, LEWIS & BOCKIUS LLP

By <u>s/Troy S. Brown</u>

Troy S. Brown, (*Pro Hac Vice*) 2222 Market Street Philadelphia, PA 19103

Email: troy.brown@morganlewis.com

#### MULLINS LAW OFFICE, LLC

By <u>s/Scott L. Mullins</u>

Scott L. Mullins, OSB No. 142504 1000 SW Broadway St., Suite 2300

Portland, OR 97205

Email: scott@slmullins.com

Attorneys for Defendant

-and-

#### ANGELI LAW GROUP LLC

By <u>s/Edward A. Piper</u>

Edward A. Piper, OSB No. 020244 121 SW Morrison St., Suite 400 Portland, OR 97204

Email: ed@angelilaw.com

## **CROWELL & MORING LLP**

By s/Anuj Vohra

Anuj Vohra, (*Pro Hac Vice*)
George David Ruttinger, (*Pro Hac Vice*)
William Benjamin O'Reilly, (*Pro Hac Vice*)
1001 Pennsylvania Avenue, NW
Washington, DC 20004
Email: <a href="mailto:avohra@crowell.com">avohra@crowell.com</a>
gruttinger@crowell.com
woreilly@crowell.com

Attorneys for Plaintiff